

expert pursuant to Fed. R. Civ.P. 26(a)(2)(B) or, where allowed, a report prepared by counsel* has been disclosed to other parties by **March 5, 2024**.
**NOTE: Amendments effective December 1, 2010, impose new disclosure requirements for certain expert witnesses.*

5. Defendant(s) shall file and serve a document identifying by full name, address, and telephone number each person whom Defendant(s) expects to call as an expert at trial and certifying that a written report prepared and signed by the expert pursuant to Fed. R. Civ.P. 26(a)(2)(B) or, where allowed, a report prepared by counsel* has been disclosed to other parties by **April 4, 2024**. **NOTE: Amendments effective December 1, 2010, impose new disclosure requirements for certain expert witnesses.*
6. Counsel shall file and serve affidavits of records custodian witnesses proposed to be presented by affidavit at trial no later than **April 4, 2024**. Objections to such affidavits must be made within fourteen (14) days after the service of the disclosure. See Fed.R.Evid. 803(6), 902(11), or 902(12) and Local Civil Rule 16.02(D)(3).
7. Discovery shall be completed no later than **June 04, 2024**. All discovery requests shall be served in time for the responses thereto to be served by this date. De bene esse depositions must be completed by discovery deadline. No motions relating to discovery shall be filed until counsel have consulted and attempted to resolve the matter as required by Local Civil Rule 7.02, and have had a telephone conference with Judge Harwell in an attempt to resolve the matter informally.
8. All dispositive motions, Daubert motions, and all other motions, except those to complete discovery, those nonwaivable motions made pursuant to Fed. R. Civ. P. 12, and those relating to the admissibility of evidence at trial (other than Daubert motions), shall be filed on or before **June 19, 2024**. See below ¶ 12 for motions in limine deadline.
9. Mediation, pursuant to Local Civil Rules 16.04 – 16.12, shall be completed in this case on or before **August 17, 2024**. See Standing Order to Conduct Mediation, which sets forth mediation requirements and is found on the court's website under Judge Harwell's forms (<http://www.scd.uscourts.gov>). At least thirty (30) days prior to this mediation deadline, counsel for each party shall file and serve a statement certifying that counsel has: (1) provided the party with a copy of Standing Order to Conduct Mediation; (2) discussed the availability of mediation with the party; and (3) discussed the advisability and timing of mediation with opposing counsel.
10. No later than **September 2, 2024** the parties shall file and exchange Fed. R. Civ. P. 26(a)(3) pretrial disclosures. Within fourteen (14) days thereafter, a party shall file and exchange Fed. R. Civ. P. 26(a)(3) objections, any objections to use of a deposition designated by another party and any deposition counter-designations under Fed. R. Civ. P. 32(a)(6).

11. Motions in limine must be filed at least three weeks prior to **October 5, 2024**. Responses to motions in limine shall be filed within seven (7) days after the motion is filed.
12. Parties shall furnish the Court pretrial briefs seven (7) days prior to the date set for jury selection (Local Civil Rule 26.05).⁶ Attorneys shall meet at least seven (7) days prior to the date set for submission of pretrial briefs for the purpose of exchanging and marking all exhibits. See Local Civil Rule 26.07.(Attorneys are reminded to view the Court's instructions online regarding verdict forms, jury instructions, deposition designations, etc. be applicable to their case.)
13. This case is subject to being called for jury selection and/or trial on or after **October 05, 2024**.

September 13, 2023
Florence, South Carolina

s/R. Bryan Harwell
R. Bryan Harwell
Chief United States District Judge

We Consent:

s/ Clinton T. Magill
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